

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

Crystal Kulick,

Plaintiff

v.

Synergetic Communication, Inc., *et al.*,

Defendants

Docket No. 3:24-cv-748-RDM

(JUDGE ROBERT D. MARIANI)

Filed Electronically

**STIPULATION TO REMAND THIS MATTER TO THE LACKAWANNA
COUNTY COURT OF COMMON PLEAS**

1. Plaintiff commenced this action by filing a complaint in the Lackawanna County Court of Common Pleas.
2. Defendant Synergetic Communications, Inc. removed this matter on May 3, 2024.
3. In this case, Plaintiff's sole claim asserts that Defendants violated the Fair Debt Collection Practices Act by disclosing her personal information to a vendor who helped mail a letter to Plaintiff.
4. However, on February 16, 2024, the Third Circuit Court of Appeals issued a decision *Barclift v. Keystone Credit Services, LLC*, Case No. 22-1295.
5. In *Barclift*, the court found that a consumer asserting a nearly identical claim to the one at issue here lacked standing to proceed in Federal Court.

6. Because *Barclift* is controlling here, and because this case originated in the Lackawanna County Court of Common Pleas, the matter should be remanded back to state court.

7. The parties therefore request that the Court enter an order remanding the case back to the Lackawanna County Court of Common Pleas.

s/ Brett M. Freeman

Brett M. Freeman
Bar Number PA 308834
Freeman Law
Attorney for Plaintiff
606 Hamlin Highway, Suite 2
Lake Ariel, PA 18436
P: (570) 589-0010
F: (570) 456-5955
Email: brett@freeman.law

s/ Ronald S. Canter (with consent)

Ronald S. Canter
Bar Number PA 94000
The Law Offices of Ronald S. Canter, LLC
Attorney for Defendant
200A Monroe St., Suite 104
Rockville, MD 20850
P: (301) 424-7490
F: (301) 424-7470
Email: rcanter@roncanterllc.com